

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF GEORGIA
MACON DIVISION

UNITED STATES OF AMERICA : CASE NO. 5:15-mj-12-CHW
 :
 v. : Violations: 18 U.S.C. § 1361; 18 U.S.C. §§ 7, 13
 : i/c/w O.C.G.A. §§ 40-6-390, 40-6-391(a)(2), 40-
 AMANDA TYQUIENGCO : 6-391(a)(6), 40-6-395(a), 16-10-24(a).
 :
 _____ :

THE UNITED STATES ATTORNEY CHARGES THE FOLLOWING SUPERCEDING
INFORMATION:

COUNT ONE

(DRIVING UNDER THE INFLUENCE)

That on or about April 29, 2015, on lands acquired for the use of the United States and under the exclusive jurisdiction thereof, known as Robins Air Force Base, Georgia, and located within the Macon Division of the Middle District of Georgia and elsewhere within the jurisdiction of the Court, **AMANDA TYQUIENGCO**, did unlawfully operate a motor vehicle by driving while under the influence of drugs to the extent that she was a less safe driver in violation of Title 18 of the United States Code, Sections 7 and 13, in conjunction with the Official Code of Georgia Annotated, Section 40-6-391(a)(2).

COUNT TWO

(DRIVING UNDER THE INFLUENCE OF DRUGS)

That on or about April 29, 2015, on lands acquired for the use of the United States and under the exclusive jurisdiction thereof, known as Robins Air Force Base, Georgia, and located within the Macon Division of the Middle District of Georgia and elsewhere within the jurisdiction of the Court, **AMANDA TYQUIENGCO**, did unlawfully operate a motor vehicle by driving while under the influence of drugs, and did drive and have said motor vehicle under her actual control while there was an amount of controlled substances as defined in O.C.G.A. § 16-13-21 present in her urine, to wit: oxycodone and alprazolam, present in her urine, all in

violation of Title 18 of the United States Code, Sections 7 and 13, in conjunction with the Official Code of Georgia Annotated, Section 40-6-391(a)(5).

COUNT THREE

(FLEEING OR ATTEMPTING TO ELUDE LAW ENFORCEMENT)

That on or about April 29, 2015, on lands acquired for the use of the United States and under the exclusive jurisdiction thereof, known as Robins Air Force Base, Georgia, and located within the Macon Division of the Middle District of Georgia, **AMANDA TYQUIENGCO**, did, willfully fail or refuse to bring her vehicle to a stop or otherwise flee or attempt to elude a pursuing police vehicle or police officer when given a visual or an audible signal to bring the vehicle to a stop in violation of Title 18 of the United States Code, Sections 7 and 13, in conjunction with Official Code of Georgia Annotated, Section 40-6-395(a).

COUNT FOUR

(RECKLESS DRIVING)

That on or about April 29, 2015, on lands acquired for the use of the United States and under the exclusive jurisdiction thereof, known as Robins Air Force Base, Georgia, and located within the Macon Division of the Middle District of Georgia and elsewhere within the jurisdiction of the Court, **AMANDA TYQUIENGCO**, did unlawfully operate a motor vehicle in reckless disregard for the safety of persons or property in violation of Title 18 of the United States Code, Section 7 and 13, in conjunction with the Official code of Georgia Annotated, Section 40-6-390.

COUNT FIVE

(OBSTRUCTION OF A LAW ENFORCEMENT OFFICER)

That on or about April 29, 2015, on lands acquired for the use of the United States and under the exclusive jurisdiction thereof, known as Robins Air Force Base, Georgia, and located within the Macon Division of the Middle District of Georgia, **AMANDA TYQUIENGCO**, did, knowingly and willfully obstruct or hinder, Ryan Payne, a law enforcement officer in the lawful

discharge of his official duties by refusing to exit her vehicle after being instructed to do so, in violation of Title 18 of the United States Code, Sections 7 and 13, in conjunction with Official Code of Georgia Annotated, Section 16-10-24(a).

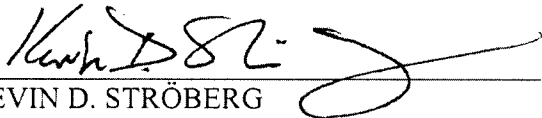
COUNT SIX

(DAMAGE TO GOVERNMENT PROPERTY)

That on or about April 29, 2015, on lands acquired for the use of the United States and under the exclusive jurisdiction thereof, known as Robins Air Force Base, Georgia, and located within the Macon Division of the Middle District of Georgia and elsewhere within the jurisdiction of the Court, **AMANDA TYQUIENGCO**, did willfully injure or commit any depredation against any property of the United States, or of any department or agency thereof, to wit: damaged the patrol vehicle driven by Senior Airman Miranda Aragon by striking it with her vehicle, , in violation of Title 18 of the United States Code, Section 1361.

MICHAEL J. MOORE
UNITED STATES ATTORNEY

BY:



KEVIN D. STRÖBERG
Georgia Bar No. 852310
Special Assistant U.S. Attorney
United States Attorney's Office
Middle District of Georgia
215 Page Road, Suite 186
Robins AFB, Georgia 31098
Telephone: (478) 222-0560